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SALINA-SPAVINAW TELEPHONE COMPANY, INC.

P.O. BOX 600 SALINA, OKLAHOMA 74365 Received & Inspected

OCT 172013

918-434-5392 800-722-3450 www.sstelco.com **FCC Mail Room**

September 26, 2013

Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: ET Docket No. 04-295
Submission of Revised CALEA System Security and Integrity Plan

Pursuant to the requirements set forth in the ET Docket No. 04-295 CALEA Second Report and Order adopted by the Commission on December 12, 2006, Salina-Spavinaw Telephone Co., Inc., a telecommunications service provider with operations in the State of Oklahoma, submits the attached amended SSI Policy to reflect updated designated contact personnel, with four copies.

Submitted by or on behalf of Salina-Spavinaw Telephone Co., Inc. on September 26, 2013.

Sincerely,

Deanna Vivion

Assistant Vice President

Enclosures

CC: David Ward, Senior Attorney, PSHSB Policy and Licensing Divison

CALEA Unit, FBI

OCT 172013

FCC Mail Room

Salina-Spavinaw Telephone Co., Inc. PO Box 600, 109 E Evanjoy St, Salina, OK 74365 Tel (918) 434-5392 Fax (918) 434-6960 Email: salina@sstelco.com

Salina-Spavinaw Telephone Co., Inc. CALEA SSI Plan Amended 09/01/2013 Policy Number 09/01/2013 Wiretaps and Surveillance

This company policy regarding the use of wiretaps and surveillance methods and procedures has been modified to include provisions ordered by the FCC in CC Docket No. 97-213 ET Docket No. 04-295 and in compliance with Section 105 of the CALEA .

OVERVIEW

Employees that receive a request from law enforcement agencies or anyone else, for any form of electronic surveillance, wire taps, customer calling information, or any information that is deemed company private or customer specific must follow these procedures exactly. Employees acting on their own and not adhering to these instructions may face possible disciplinary actions, including possible termination of employment.

Actions and Authorization

Any employees receiving a request for any form of electronic surveillance, wire taps or customer specific information from anyone, law enforcement or otherwise should immediately direct the requesting party to Jackie D. Ball, Central Office Manager, Johnny Alexander, Outside Plant Manager, or Deanna Vivion, Business Office Manager, who have been designated by this company as the only authorized persons to accept these requests and act on them. The authorized company employee(s) will be specifically charged with the responsibility to assist law enforcement in conducting any interception of communications or access to call-identifying information. In addition they will be responsible for insuring that appropriate legal authorization in the form of a court order signed by a judge or magistrate authorizing or approving interception of wire or electronic communications pursuant to 18 U.S.C 2518(7), or any other relevant federal or state statute, has been received. These employee names and titles have been submitted to local law enforcement agencies in advance so that requests of this nature should be submitted to them first. In the event that the designated employees are not available, all requests must be immediately directed to the most senior company management employee available.

The **senior** employee(s) designated to act on these types of requests will assume total responsibility for the request from receipt of the request to its final disposition including the proper certification and storage of all details regarding the request. Their specific responsibilities include but are not limited to:

Being available to be contacted by law enforcement concerning a court ordered wire tap or surveillance request twenty-four hours a day, seven days a week.

Ensuring that the request is in accordance with appropriate legal authorization such as a court order signed and dated by the judge or magistrate authorizing or approving the request, and being authorized to act on the request from initiating the request for interception or access to call-identifying information, instructing those performing the various tasks involved, overseeing that the required rules and regulations regarding surveillance and/or call content requests are being adhered to.

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RECORDS RETENTION

All information regarding a lawful request or any other request for interception and/or call content information will be documented on an approved certification form and maintained in the following manner.

The signed and dated court order and the name and department of the presenting law enforcement officer, or in the case of an unauthorized request a written document originated by the authorized company employee detailing the request.

Information regarding the request including the date and time the request was presented, the date and time the circuit was opened for law enforcement, the type of interception or call-identifying information requested, the telephone number, circuit identification, customer name, and the duration the request was in effect. Also to be included are the actions taken to obtain this information, and the signature and title of the designated company employee authorizing the action requested in the court order.

After review of the certification form and associated documents the authorized employee will sign and date the record and insure that all authorized and unauthorized requests are place in the Company locked vault for a period of two (2) years.

UNAUTHORIZED USE OF SURVEILLANCE CAPABILITIES

Any employee who knowingly misuses the company capabilities used to provide this service to law enforcement agencies under a lawful request will face severe disciplinary measures up to and including dismissal. Information regarding any attempt to interfere with a lawful request for surveillance or to obtain protected or private call content information will be submitted to local law enforcement.

These policies and procedures will remain in effect until notice is provided regarding a significant change.

Updated on this day of <u>1st</u> of <u>September, 2013.</u>

Deanna Vivion, Asst. Vice President

Salina-Spavinaw Telephone Co., Inc.

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Salina-Spavinaw Telephone Co., Inc. CALEA SSI Plan Amended 09/01/2013

Policy Number 09/01/2013 Wiretaps and Surveillance

Appendix A

<u>Description and Contact Information of System Security and Integrity (SSI) Representative/s</u>

SSI Designated Employee Contact Information for CALEA:

Designated Employee Name	Designated Employee Name Designated Employee Title	Business Hours	Business Telephone No.	Cellular Telephone No.
Jackie D. Ball	Central Office Manager	MonFri. 8 a.m. to 5 p.m. CST	918-434-5392	918-277-6305
Johnny R. Alexander	Outside Plant Manager	MonFri. 8 a.m. to 5 p.m. CST	918-434-5392	918-277-6303
Deanna S. Vivion	Business Office Manager	Business Office Manager MonFri. 8 a.m. to 5 n.m. CST	918-434-5392	918-864-6544